

STATEMENT OF DEFAULT

Debtor(s): Patricia M. Bach

Case No. 18 B 07070 Chapter 13

Moving Creditor: Nationstar Mortgage LLC d/b/a Champion Mortgage Company Date Case Filed: 3/12/2018

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 7/10/2018

1. Collateral

- a. ☒ Home
b. ☐ Car
c. ☐ Other (describe) _____

2. Balance Owed as of Petition Date \$160,515.99

Total of all other Liens against Collateral \$0

2. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:

3. Estimated Value of Collateral (*must* be supplied in *all* cases) \$174,000.00

4. Default

- a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
- b. ☐ Post-Petition Default
- i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
- ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____
Amount \$ _____

5. Other Allegations

- a. ☒ Lack of Adequate Protection §362(d)(1) _____
- i. ☐ No insurance
- ii. ☒ Taxes unpaid Amount \$1,377.79
- iii. ☐ Rapidly depreciating asset _____
- iv. ☐ Other _____
- b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
- c. ☐ Other "Cause" § 362(d)(1)
- i. ☐ Bad Faith (describe) _____
- ii. ☐ Multiple filings
- iii. ☐ Other (describe) _____
- d. Debtor's Statement of Intention regarding the Collateral
- i. ☐ Reaffirm ii. ☐ Redeem
- iii. ☐ Surrender iv. ☐ No Statement of Intentions Filed

Date: June 1, 2020

/s/ Kathryn A. Klein
Attorney for Secured Creditor